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UNITED STATES BANKRUPTCY COURT

EASTERN DISTRICT OF CALIFORNIA

In the Matter of

Case No. 09-16328-B-7K
Chapter 7; DC-PK-2

PRIDE TRANSPORTATION

Debtor(s).

**TRUSTEE'S MOTION TO SELL
PERSONAL PROPERTY**

DATE: June 3, 2010
TIME: 10:00 A.M.
PLACE: 1300 – 18th Street, Dept. B, Bakersfield, CA
JUDGE: W. Richard Lee

TO THE HONORABLE W. RICHARD LEE, UNITED STATES BANKRUPTCY COURT
JUDGE:

COMES NOW JEFFREY VETTER, Trustee of the above-referenced bankruptcy
estate, through his attorney of record, PATRICK KAVANAGH, and respectfully represents
as follows:

1. Debtor(s) filed this case as a Chapter 11 on July 6, 2009. It was converted
to a Chapter 7 on February 5, 2010.
2. Jeffrey Vetter is the duly appointed, qualified and acting trustee in the
above-captioned bankruptcy case.
3. This Court has jurisdiction over this motion by virtue of 28 U.S.C. §1334 and
11 U.S.C. §363. This is a core matter under 28 U.S.C. §157(b)(2)(A) & (N).

1 4. The assets of this estate include a 2005 Doonan 48-ft. trailer. Debtor
2 valued the trailer at \$24,000.00 subject to a lien in the approximate amount of \$7,613.63
3 to Great Western Leasing

4 5. Trustee has received an offer for the purchase of said trailer from Great
5 Western Leasing.

6 6. The terms of said offer are as follows: \$8,000.00 for the estate's interest in
7 said vehicle. Trustee has received a deposit of \$1,000.00 and the balance of \$7,000.00
8 upon entry of the order approving the sale.

9 7. Said offer is the best and highest offer received for said asset and, in the
10 opinion of the trustee, said offer is for the full and fair market value of said assets.
11

12 8. The trustee believes that this is a fair price and a reasonable exercise in the
13 trustee's business judgment. Trustee believes that confirmation of said sale on the terms
14 set forth above is in the best interest of the creditors of the estate and all parties in
15 interest.
16

17 WHEREFORE, Trustee prays that after appropriate notice and opportunity to be
18 heard, Trustee be authorized to sell the estate's interest in said asset on the terms set
19 forth above.
20

21 DATED: *May 6, 2010*

22 LAW OFFICES OF PATRICK KAVANAGH

23
24
25 By 

26 PATRICK KAVANAGH
27 Attorney for Trustee
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